

IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF DELAWARE

ALICIA A. COHEN,

Plaintiff,

v.

RONALD A. COHEN,

Defendant.

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C.A. No. 19-1219 (MN)

**VERDICT FORM**



### **INSTRUCTIONS**

In answering the following questions and filling out this Verdict Form, you are to follow all of the instructions I have given you in the Court's charge. Your answer to each question must be unanimous. Some of the questions contain legal terms that are defined and explained in detail in the Jury Instructions. Please refer to the Jury Instructions if you are unsure about the meaning or usage of any legal term that appears in the questions below.



**Count I (Federal Law):**

1. Do you find that Plaintiff has proven by a preponderance of the evidence that, while she was a minor, she suffered personal injury as a victim of Defendant violating any of the following:

	YES (for Plaintiff)	NO (for Defendant)
Crossing a State Line with Intent to Engage in Sexual Abuse of a Child	_____	_____X_____
Sexual Exploitation of a Child	_____	_____X_____
Parent Permitting Sexual Exploitation of a Child	_____	_____X_____
Transporting or Shipping Material Involving Sexual Exploitation of Minors	_____	_____X_____
Transportation of Minor with Intent to Engage in Sexual Activity	_____	_____X_____

**Count II (Delaware Law - Sexual Abuse of a Minor):**

2. Do you find that Plaintiff has proven by a preponderance of the evidence that Defendant committed any of the following:

	YES (for Plaintiff)	NO (for Defendant)
Incest	_____X_____	_____
Sexual Extortion	_____X_____	_____
Continuous Sexual Abuse of a Child	_____X_____	_____
Indecent Exposure	_____X_____	_____
Offensive Touching	_____X_____	_____



**Count III (Delaware Law - Assault or Battery):**

3. Do you find that Plaintiff has proven by a preponderance of the evidence that Defendant is liable for assault or battery that occurred in Delaware?

X YES (for Plaintiff) \_\_\_\_\_ NO (for Defendant)

**Count IV (Delaware Law - Intentional Infliction of Emotional Distress):**

4. Do you find that Plaintiff has proven by a preponderance of the evidence that Defendant is liable for intentional infliction of emotional distress that occurred in Delaware?

X YES (for Plaintiff) \_\_\_\_\_ NO (for Defendant)

**Count V (Delaware Law - Negligent Infliction of Emotional Distress):**

5. Do you find that Plaintiff has proven by a preponderance of the evidence that Defendant is liable for negligent infliction of emotional distress that occurred in Delaware?

X YES (for Plaintiff) \_\_\_\_\_ NO (for Defendant)

**Count VI (Delaware Law - False Imprisonment):**

6. Do you find that Plaintiff has proven by a preponderance of the evidence that Defendant is liable for false imprisonment that occurred in Delaware?

X YES (for Plaintiff) \_\_\_\_\_ NO (for Defendant)

**Count VII (Delaware Law - Human Trafficking):**

7. Do you find that Plaintiff has proven by a preponderance of the evidence that Defendant engaged in either of the following in Delaware?

	YES (for Plaintiff)	NO (for Defendant)
Sexual Servitude of a Minor	_____	<u>X</u>
Trafficking of Persons for Forced Labor or Services	_____	<u>X</u>



**Count VIII (Florida Law - Sexual Battery of a Minor):**

8. Do you find that Plaintiff has proven by a preponderance of the evidence that Defendant engaged in either of the following in Florida?

	YES (for Plaintiff)	NO (for Defendant)
Sexual Battery Upon a Person Less Than 12 Years of Age	_____	_____ <u>X</u>
Solicitation of a Child to Engage in an Act that Constitutes Sexual Battery by a Person in Familial or Custodial Authority	_____	_____ <u>X</u>

**Count IX (Florida Law - Human Trafficking):**

9. Do you find that Plaintiff has proven by a preponderance of the evidence that Defendant engaged in human trafficking that occurred in Florida?

\_\_\_\_\_ YES (for Plaintiff)      X \_\_\_\_\_ NO (for Defendant)

**Count X (Florida Law - Incest):**

10. Do you find that Plaintiff has proven by a preponderance of the evidence that Defendant committed incest in Florida?

\_\_\_\_\_ YES (for Plaintiff)      X \_\_\_\_\_ NO (for Defendant)

**Count XI (Florida Law - Intentional Infliction of Emotional Distress):**

11. Do you find that Plaintiff has proven by a preponderance of the evidence that Defendant is liable for intentional infliction of emotional distress?

\_\_\_\_\_ YES (for Plaintiff)      X \_\_\_\_\_ NO (for Defendant)

**Count XII (Florida Law - False Imprisonment):**

12. Do you find that Plaintiff has proven by a preponderance of the evidence that Defendant committed false imprisonment in Florida?

\_\_\_\_\_ YES (for Plaintiff)      X \_\_\_\_\_ NO (for Defendant)



**Count XIII (New Jersey Law - Child Sexual Abuse):**

13. Do you find that Plaintiff has proven by a preponderance of the evidence that Defendant engaged in child sexual abuse?

\_\_\_\_\_ YES (for Plaintiff)

X NO (for Defendant)

**Count XIV (New Jersey Law - Human Trafficking):**

14. Do you find that Plaintiff has proven by a preponderance of the evidence that Defendant engaged in human trafficking?

\_\_\_\_\_ YES (for Plaintiff)

X NO (for Defendant)

**Damages:**

15. If you answered YES to any of the above questions, what amount of damages, if any, do you award Plaintiff? If you did not answer YES to any of the above questions, skip this question.

\$ 750,000 (Actual/Compensatory)

\$ 750,000 (Punitive Damages)



**CONCLUSION**

You have reached the end of the verdict form. Review the completed form to ensure that it accurately reflects your **unanimous** determinations. All jurors should then sign and date the verdict form in the space below and notify the Court Security Officer that you have reached a verdict.

Dated: 9/17/2021

